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December 12, 2024

Hon. Jesse M. Furman, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Centre Street
New York, NY 10007

Re: Rothschild Broadcast Distribution Systems, LLC v. Kaltura, Inc.
Civil Action No. 24-06234 (JMF)

Dear Judge Furman,

This firm, along with Finnegan, Henderson, Farabow, Garrett & Dunner LLP represents Defendant Kaltura, Inc. This evening, as the parties were preparing their joint case management submission due today, the parties agreed to a settlement in principle including a dismissal with prejudice of the above captioned suit and a license to the patent-in-suit, related patents, and any patent applications in the same family as the patent in suit, the license extending to Kaltura, Inc, and all subsidiaries, parent companies, affiliates, joint ventures, or sister companies of Kaltura Inc, as well as downstream customers of products made, used, sold, or licensed by any of the foregoing Kaltura entities.

The agreement in principle also includes the parties waiving and dismissing all claims and counterclaims that they raised or could have raised, with each party bearing its own costs, expenses, and attorneys' fees.

We hope to finalize the formal agreement in the coming days and file a dismissal with prejudice by this coming Monday. Therefore, we hereby ask the Court to waive today's deadline for submitting the joint case management paperwork.

Plaintiff's counsel provided written authorization for submission of this letter.

GIBBONS P.C.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'WPD', with a long, sweeping horizontal stroke extending to the right.

William P. Deni

cc: Plaintiff's counsel (via ECF)